

19-0721

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Gloria Kearse   Debtor(s)  PENNYMAC LOAN SERVICES, LLC  Movant  v. Gloria Kearse and William C. Miller, Esquire  Respondents	20-11014 ELF  Chapter 13 Proceeding  Hearing Date: 10/05/2021 at 9:30 AM
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**CERTIFICATE OF NO RESPONSE  
TO MOTION FOR RELIEF**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on September 8, 2021 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than **09/22/2021**.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,  
POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin  
By: Jill Manuel-Coughlin  
Attorney ID # 63252  
Eight Neshaminy Interplex, Suite 215  
Trevose, PA 19053  
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Attorney for Movant  
DATED: September 24, 2021

19-0721

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Gloria Kears	20-11014 ELF
	Chapter 13 Proceeding
Debtor(s)	Hearing Date: 10/05/2021 at 9:30 AM
PENNYMAC LOAN SERVICES, LLC	
Movant	
v.	
Gloria Kears and	
William C. Miller, Esquire	
Respondents	

**CERTIFICATION OF SERVICE AND NOTICE**

JILL MANUEL-COUGH LIN, counsel for PENNYMAC LOAN SERVICES, LLC, hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on September 24, 2021:

**Served Electronically:**

Kenneth E. West, Esquire  
830 Lansdowne Avenue  
Drexel Hill, PA 19026  
Attorney for Debtor(s)

William C. Miller, Esquire  
Office of the Chapter 13 Standing Trustee  
P.O. Box 40837  
Philadelphia, PA 19107  
Trustee

**Served Via 1st Class Mail:**

Gloria Kears  
22 E Marshall Rd  
Lansdowne PA 19050  
Debtor

POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin

By: Jill Manuel-Coughlin

Attorney ID # 63252

Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090

Facsimile: 215-942-8661

E-mail: Jill@powerskirm.com

Attorney for Movant

DATED: September 24, 2021